

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:)	
)	
MICHELLE VERONICA MITCHELL)	Case No. 21-33610-KLP
)	Chapter 13
Debtor)	

MOTION TO INCUR DEBT

COMES NOW, the Debtor, by counsel, and as and for Debtor's Motion to Incur Debt, states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on December 10, 2021.

2. The Debtor has applied for and West Broad Honda has approved a loan to the Debtor in the amount of \$26,928.30 plus interest at 16.99% per annum to be repaid with 72 equal monthly payments of \$598.90 for the purchase of a 2020 Mitsubishi Outlander or similar vehicle.

3. The Debtor needs to purchase the referenced vehicle because the Debtor's current vehicle is beginning to need expensive repairs and the Debtor needs a reliable vehicle to commute to work and for other matters.

4. The purchase of the vehicle is in the best interest of the Debtor and will facilitate Debtor's ability to perform under the Chapter 13 Plan filed herein.

5. The Debtor's Chapter 13 Plan has been confirmed.

James E. Kane (VSB #30081)
Jason E. Kane (VSB #96448)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

WHEREFORE, the Debtor requests that the Court enter an Order approving the aforesaid loan on the terms stated herein and for such other relief as the Court may deem appropriate.

MICHELLE VERONICA MITCHELL

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
Jason E. Kane (VSB #96448)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on August 23, 2022, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record who have signed up to receive such notification and by first class mail to the parties on the attached list.

/s/ James E. Kane
James E. Kane

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NOTICE OF MOTION

The above Debtor has filed Motion to Incur Debt in the above matter.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, within twenty-one (21) days from the date of this Notice you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
Kane & Papa, P.C.
1313 East Cary Street
Richmond, Virginia 23219

- Attend a hearing to be scheduled at a later date. You will receive a separate notice of hearing. If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

Dated: August 23, 2022

MICHELLE VERONICA MITCHELL

By: /s/ James E. Kane

Counsel

James E. Kane (VSB #30081)
Jason E. Kane (VSB #96448)
KANE & PAPA, P.C.
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/s/ James E. Kane

James E. Kane

Acceptance Now
ATTN BANKRUPTCY
5501 Headquarters Drive
Plano, TX 75024

Alteon Health
PO Box 826481
Philadelphia, PA 19182

American Infosource
T Mobile/T-Mobile USA Inc
PO Box 248848
Oklahoma City, OK 73124

Ashley Funding Services
P. O. Box 10587
Greenville, SC 29603

BB&T
ATTN BANKRUPTCY
P.O. Box 1847
Wilson, NC 27894

Bon Secours
P.O. Box 409601
Atlanta, GA 30384

Bon Secours Regional Memorial
c/o SPINELLA, OWINGS & SHAIA
8550 Mayland Drive, Suite 1
Henrico, VA 23294

Commonwealth Radiology, P.C.
2810 N. Parham Road
Suite 315
Richmond, VA 23294

Credit Protection Asso
13355 Noel Rd Ste 2100
Dallas, TX 75240

Gastrointestinal Specialists
2369 Staple Mill Road
Suite 200
Richmond, VA 23230

Highland Woods Apartments
583 E. Beal Street
Henrico, VA 23075

Horizon Fin
8585 Broadway #880
Merrillville, IN 46410

Hunters Mill Townhouses Assoc
c/o myStreet Community Mgmt
7231 Forest Ave, Ste 102
Richmond, VA 23226

IC System, Inc
Attn: Bankruptcy
Po Box 64378
St. Paul, MN 55164

IC Systems, Inc
444 Highway 96 East
Po Box 64378
St Paul, MN 55164

Internal Revenue Service
Centralized Insolvency Operati
P. O. Box 7346
Philadelphia, PA 19101-7346

Lafayette Ayers & Whitlock
10160 Staples Mill Road
Suite 105
Glen Allen, VA 23060

Memorial Regional Medical Cent
P.O. Box 33130
Phoenix, AZ 85067

Miramed Revenue Group
Attn: Bankruptcy
255 West Michigan Ave
Jackson, MI 49201

Miramedr^g
991 Oak Creek Dr
Lombard, IL 60148

MLR Solutions
ATTN BANKRUPTCY
PO Box 60536
King of Prussia, PA 19406

Natl Fitness
1645 E Hwy 193
Layton, UT 84040

New Generations FCU
1700 Robin Hood Road
Richmond, VA 23220

Omega A Cameron

Omega Cameron

Penn Credit
PO Box 988
Harrisburg, PA 17108

Peritus Portfolio
PO BOX 141419
Irving, TX 75014

Phoenix Financial Services, LLC
Attn: Bankruptcy
Po Box 361450
Indianapolis, IN 46236

Portfolio Recovery
Attn: Bankruptcy
Po Box 41067
Norfolk, VA 23541

Quantum3 Group, LLC
PO Box 2489
Kirkland, WA 98083

Receivable Management
7206 Hull Street Rd Ste
North Chesterfield, VA 23235

Receivable Management Inc
Bankruptcy Dept/Receivables Management S
7206 Hull Rd Ste 211
Richmond, VA 23235

Richmond Finance Company
12560 PATTERSON AVENUE
Henrico, VA 23238

Richmond Finance Company
200 N 21st St
Richmond, VA 23223

Samuel I. White, PC
1804 Staples Mill Road
Suite 200
Richmond, VA 23230

Sandra F. Stevenson

Sandra Stevenson

Seas & Associates
PO Box 15174
Little Rock, AR 72231

Selene Finance
PO Box 422039
Houston, TX 77242

Sensible Auto Finance
PO Box 4249
Danbury, CT 06813

Solodar & Solodar
4825 Radford Ave.
Suite 201
Richmond, VA 23230

Source Receivables Mgmt, Llc
Attn: Bankruptcy Dept
Po Box 4068
Greensboro, NC 27407

Sprint Bankruptcy
PO Box 7949
Overland Park, KS 66207

Stern Recovery Services, Inc.
Attn: Bankruptcy
415 N Edgeworth St Suite 210
Greensboro, NC 27401

Sternrecsvcs
415 N Edgeworth St Suite 210
Greensboro, NC 27401

Steven C Davis
c/o Godwin-Jones Price
20 South Auburn Ave
Richmond, VA 23221

Verizon
Verizon Wireless Bk Admin
500 Technology Dr Ste 550
Weldon Springs, MO 63304

Westlake Financial Svc
4751 Wilshire Blvd Suite 100
Los Angeles, CA 90010